

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
 :  
SquareTwo Financial Services : Case No. 17-\_\_\_\_\_ ( )  
Corporation, et al.,<sup>1</sup> :  
 : (Joint Administration Pending)  
Debtors. :  
-----X

**DECLARATION IN SUPPORT OF EMPLOYMENT AND RETENTION OF  
BROWN LAW, PLLC AS A COLLECTIONS FIRM**

I, Shaun Brown, declare as follows:

1. I am a member of the firm Brown Law, PLLC (the “**Firm**”), which has been employed by the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**”) in the ordinary course of their business. I am authorized to provide this Declaration on behalf of the Firm. The information contained herein is based on my knowledge or the knowledge of people that work under my supervision. The Debtors wish to employ and retain the Firm to continue providing such collections services during their chapter 11 cases. This Declaration is submitted in support of the employment and retention of the Firm by the Debtors, nunc pro tunc to the Petition Date.<sup>2</sup>

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<sup>1</sup> The Debtors in these chapter 11 cases and the last four digits of each Debtor’s federal taxpayer identification number and/or Canadian equivalent are as follows: Astrum Financial, LLC (2265); Autus, LLC (2736); CA Internet Marketing, LLC (7434); CACH, LLC d/b/a Fresh View Funding (6162); CACV of Colorado, LLC (3409); CACV of New Jersey, LLC (3499); Candeo, LLC (2809); CCL Financial Inc. (7548); Collect Air, LLC (7987); Collect America of Canada, LLC (7137); Healthcare Funding Solutions, LLC (2985); Metropolitan Legal Administration Services, Inc. (6811); Orsa, LLC (2864); Preferred Credit Resources Limited (0637); ReFinance America, Ltd. (4359); SquareTwo Financial Canada Corporation (EIN: 1034; BN: 0174); SquareTwo Financial Corporation (1849); and SquareTwo Financial Services Corporation d/b/a Fresh View Solutions (5554). The Debtors’ executive headquarters are located at 6300 South Syracuse Way, Suite 300, Centennial, CO 80111.

<sup>2</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the proposed interim order attached as Exhibit A to the Debtors’ Motion for Interim and Final Orders Authorizing Debtors to (A) Continue Using Their Existing Collections System; (B) Employ and Retain Certain Related Law Firms in the Ordinary Course of Business Nunc Pro Tunc to the Petition Date and (C) Granting Related Relief (the “**Collections Professionals Order**”), filed concurrently herewith.

2. Neither I, the Firm, nor any member, counsel or associate thereof, insofar as I have been able to ascertain, has any connection with the Debtors, their creditors, or any party in interest herein.

3. The Firm does not represent or hold any interest adverse to the Debtors or their estates with respect to the engagement for which it is to be retained.

4. This Firm and certain of its members, counsel, and associates may have in the past represented, currently represent and may in the future represent entities that are claimants or equity security holders of the Debtors in matters unrelated to the Debtors' chapter 11 cases. None of those past or current representations are material.

5. The Firm is paid on a commission basis by Power Day, LLC plus reimbursement of expenses. In addition, the Debtors directly pay the firm any attorneys' fees and costs awarded by courts in favor of the Debtors. As of March 17, 2017, the Firm held a Court Cost Retainer in the amount of \$32,730.72, and an Attorney's Fee Retainer in the amount of \$5,159.51. The Firm intends to apply such retainer to any unpaid prepetition fees and expenses. The Firm intends to apply for compensation for professional services rendered during the ordinary course of business and reimbursement of expenses directly to the Debtors through the continuation of the Debtors' prepetition practice.

6. Except as provided in the Collections Professionals Order, no representations or promises have been received by the Firm as to compensation in connection with these cases other than in accordance with the provisions of the Bankruptcy Code. The Firm has no agreement with any other entity to share with such entity any compensation received by the Firm.

*[The remainder of this page is intentionally left blank.]*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 19, 2017

/s/ Shaun Brown

Shaun Brown

Brown Law, PLLC

P.O. Box 420670

Houston, Texas 77242

**Collections Firm Questionnaire**

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**COLLECTIONS FIRM QUESTIONNAIRE**

TO BE COMPLETED BY PROFESSIONALS EMPLOYED BY ANY ENTITY IN THE  
ABOVE-CAPTIONED CASES (collectively, the “**Debtors**”):

If more space is needed, please complete on a separate page and attach.

1. Name and address of firm:  
Brown Law, PLLC  
\_\_\_\_\_  
P.O. Box 420670  
\_\_\_\_\_  
Houston, Texas 77242  
\_\_\_\_\_
2. Date of retention: Brown Law, PLLC was initially retained on or  
about September 1, 2014  
\_\_\_\_\_
3. Type of services provided:  
Legal collections for the Texas region and some other licensed or  
permitted states including Pennsylvania, Virginia, Maryland, and the  
District of Columbia.  
\_\_\_\_\_
4. Brief description of services to be provided:  
Legal collections and creditor’s rights representation  
\_\_\_\_\_

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5. Prepetition claims against any of the Debtors held by the firm:  
Amount of Claim: \$250 (approximately)  
Date claim arose: 3/16/17 – 3/19/17  
Source of Claim: Approximate attorney's fees that will be owed to the firm accruing from 3/16/17 – 3/19/17
6. Prepetition claims against any of the Debtors held individually by any member, associate, or professional employee of the firm:  
Name: N/A  
Status: \_\_\_\_\_  
Amount of Claim: \_\_\_\_\_  
Date claim arose: \_\_\_\_\_  
Source of claim: \_\_\_\_\_
7. Disclose the nature, and provide a brief description, of any interest adverse to the Debtors or to their estates respecting the matters on which the above-named firm is to be employed.  
N/A  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_